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KENNETH GOULD
7

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 KENNETH GOULD,

15 Defendant.
16

Case No. 1:21-cr-00243-JLT-SKO

STIPULATION TO PERMIT TRAVEL
TO LAS VEGAS, NEVADA; ORDER

JUDGE: Hon. Stanley A. Boone

17 IT IS HEREBY STIPULATED by and between the parties, through their respective
18 counsel, Assistant United States Attorney Joseph Barton, counsel for plaintiff, and Assistant
19 Federal Defender Erin Snider, counsel for defendant Kenneth Gould, that the Court may enter an
20 order permitting Mr. Gould to travel to Las Vegas, Nevada, located in the District of Nevada,
21 between June 5, 2023, and June 9, 2023.

22 Mr. Gould's conditions of release restrict his travel to the Central District of California,
23 where he resides, and the Eastern District of California. *See* ECF #12. Mr. Gould would like to
24 visit with his daughter and grandchildren, who live in Las Vegas, Nevada, which is located in the
25 District of Nevada. If approved, Mr. Gould would leave his residence on June 5, 2023, and return
26 on June 9, 2023. Mr. Gould is not supervised by Pretrial Services; accordingly, defense counsel
27 did not obtain Pretrial Services' position on this request.
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Respectfully submitted,

PHILLIP A. TALBERT
United States Attorney

Date: June 1, 2023

/s/ Joseph Barton
JOSEPH BARTON
Assistant United States Attorney
Attorney for Plaintiff

HEATHER E. WILLIAMS
Federal Defender

Date: June 1, 2023

/s/ Erin Snider
ERIN SNIDER
Assistant Federal Defender
Attorney for Defendant
KENNETH GOULD

ORDER

Upon the parties' stipulation and for good cause shown, the Court hereby authorizes Mr. Gould to travel to Las Vegas, Nevada, located in the District of Nevada, between June 5, 2023, and June 9, 2023.

IT IS SO ORDERED.

Dated: June 1, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE